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706 Sansome Street
San Francisco, CA 94111
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Lead Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF DAVID Y. HWU IN
SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' OPPOSITION TO THE IRICO
DEFENDANTS' AMENDED MOTIONS TO
DISMISS CLAIMS OF DIRECT
PURCHASER PLAINTIFFS FOR LACK OF
SUBJECT MATTER JURISDICTION (FED.
R. CIV. P. 12(b)(1)) (ECF Nos. 5410, 5412)**

Date: May 30, 2019
Time: 2:00 p.m.
Judge: Honorable Jon S. Tigar
Courtroom: 9

1 I, David Y. Hwu, declare:

2 1. I am an attorney at Saveri & Saveri, Inc., Lead Counsel for Direct Purchaser
3 Plaintiffs (“DPPs”) in this action. I am a member of the Bar of the State of California and admitted
4 to practice in the Northern District of California. I have been involved in many aspects of this case
5 since 2011. I make this Declaration in Support of DPPs’ Opposition to the Irico Defendants’
6 Amended Motions to Dismiss Claims of Direct Purchaser Plaintiffs for Lack of Subject Matter
7 Jurisdiction (Fed. R. Civ. P. 12(b)(1)) (ECF Nos. 5410, 5412). Except as otherwise stated, I have
8 personal knowledge of the facts stated below.

9 2. On July 5, 2018, DPPs submitted a letter brief to Judge Vaughn R. Walker (Ret.),
10 the special master for discovery disputes in this matter, seeking an order to compel supplemental
11 discovery from the Irico Defendants, including related to sales by China National Electronics
12 Import & Export Caihong Co. (“Import-Export”; referred to as “Caihong Co.” in briefing before
13 Judge Walker). After briefing, Judge Walker ordered the Irico Defendants to:

14 search for and produce all documents relating to any and all sales of Irico CRT
15 Products into the United States during the class period by any party whether
16 related or not, including Irico Electronics, Xian Irico Display Technology Co, Ltd
17 and [China National Electronics Import & Export] Caihong Co, and any other
18 entity that exported Irico’s CRT products into the United States

18 ECF No. 5324 at 4–5.

19 3. In connection with further discovery responses and meet and confer, Irico did not
20 produce any further documents relating to U.S. sales, as required by Judge Walker’s order. On
21 September 11, 2018, DPPs filed a second motion to compel, to compel compliance with Judge
22 Walker’s order. After briefing, Judge Walker ordered that “the Irico defendants must search all
23 Caihong files, and any other files to which they have access, for responsive documents and produce
24 them to the DPPs in electronic form no later than October 5, 2018.” ECF No. 5352 at 6.

25 4. In response to Judge Walker’s order, on January 16, 2019, the Irico Defendants
26 electronically produced documents Bates labeled IRI-CRT-00003544 through IRI-CRT-00003645
27 comprising the production labeled IRI-CRT010. Attached hereto as Exhibit 1 is a true and correct
28 copy of a letter from Stuart C. Plunkett of Baker Botts L.L.P., counsel for the Irico Defendants, to

1 counsel for DPPs and Indirect Purchaser Plaintiffs (“IPPs”) regarding the transmission of
2 production IRI-CRT010, dated January 16, 2019. Mr. Plunkett’s letter states that the “production
3 contains documents collected from China National Electronics Import & Export Caihong Co.
4 (‘CNEIECC’), including documents from the CNEIECC archives.”

5 5. Attached hereto as Exhibit 2 is a true and correct copy of an email chain I received
6 on January 23, 2019, including an email from Tom Carter of Baker Botts L.L.P. to Qianwei Fu of
7 Zelle LLP, counsel for IPPs. According to Mr. Carter’s email, the files for IRI-CRT-00003544,
8 IRI-CRT-00003546, and IRI-CRT-00003643 are “.DBF” database files that require a DBF viewer
9 application in order to view the Chinese characters. Using the DBF viewer application
10 recommended by Mr. Carter, I saw that IRI-CRT-00003544 native file contained 8,966 rows of
11 entries, IRI-CRT-00003546 contained 1,071 rows, and IRI-CRT-00003643 3,115 rows. I
12 determined that translating and printing these databases in their entirety for the purposes of
13 examining a deposition witness would be impractical. In accordance with section XVI.C. of the
14 Court’s Order re Discovery and Case Management Protocol, ECF No. 1128 (Apr. 3, 2012) (“(iii)
15 “Calendars, notebooks, annual reports, financial statements and regulatory filings need not be
16 translated in their entirety”), I copied and pasted excerpts from the files into Microsoft Excel
17 spreadsheets which I subsequently had certified translated by one of DPPs’ translation vendors.
18 Because it was not possible to print the database files with row numbers using the DBF viewer
19 application, after excerpting entire rows into Excel, I added reference numbers to each row to
20 indicate the source row from the database so that each entry could be located in the original native
21 file.

22 6. IRI-CRT-00003546E (Selected Records) was marked as Deposition Exhibit No.
23 8413 and is Exhibit 15 to the Saveri Declaration, filed herewith.

24 7. Based on the data contained in IRI-CRT-00003546, it appears that from 1996 to
25 1999, Import-Export sold CRTs and CRT products to companies located in the U.S., including,
26 among others, Irico USA and G.P.X., Inc., amounting to \$8.02 million dollars; of this, \$7.7 dollars
27 went to Irico USA. According to internet research I conducted, G.P.X, Inc. is a company based in
28

1 St. Louis, Missouri. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the
2 GPX, Inc. website I downloaded on February 26, 2019 from <https://gpx.com/about.html>.

3 I declare under the penalty of perjury under the laws of the United States of America that
4 the foregoing is true and correct.

5 Executed this 1st day of April, 2019 in San Francisco, California.

6
7 /s/ David Y. Hwu
David Y. Hwu

EXHIBIT 1

BAKER BOTTS LLP

101 CALIFORNIA ST.
SUITE 3600
SAN FRANCISCO, CALIFORNIA
94111

TEL +1.415.291.6200
FAX +1.415.291.6300
BakerBotts.com

AUSTIN
BEIJING
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MOSCOW
NEW YORK
PALO ALTO
RIYADH

SAN FRANCISCO
WASHINGTON

January 16, 2019

VIA E-MAIL

Stuart C. Plunkett
TEL: 415.291.6203
FAX: 415.291.6303
stuart.plunkett@bakerbotts.com

R. Alexander Saveri (E-mail: rick@saveri.com)
Geoffrey C. Rushing (E-mail: grushing@saveri.com)
Cadio Zirpoli (E-mail: cadio@saveri.com)
Matthew D. Heaphy (E-mail: mheaphy@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200
San Francisco, CA 94111

Mario N. Alioto (malioto@tatp.com)
Lauren C. Capurro (lauren russell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123

Christopher Micheletti (cmicheletti@zelle.com)
44 Montgomery Street
Suite 3400
San Francisco CA 94104

Re: In re: Cathode Ray Tube (CRT) Antitrust Litigation -
Master File No. 3:07-cv-05944-SC; MDL No. 1917

Counsel:

Irico Defendants are electronically producing documents Bates labeled IRI-CRT-00003544 through -3645, which can be downloaded at in the link included in the cover email. Passwords to access the download link and extract the files will be sent under separate cover. Irico Defendants designate this submission as "Confidential" pursuant to the Stipulated Protective Order.

This production contains documents collected from China National Electronics Import & Export Caihong Co. ("CNEIECC"), including documents from the CNEIECC archives.

If you have any questions or have difficulty accessing these documents, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stuart C. Plunkett', with a long horizontal flourish extending to the right.

Stuart C. Plunkett

EXHIBIT 2

Matthew Heaphy

From: Tom.Carter@BakerBotts.com
Sent: Wednesday, January 23, 2019 2:12 PM
To: QFu@zelle.com; stuart.plunkett@bakerbotts.com
Cc: john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Matthew Heaphy; Geoff Rushing; Rick Saveri; CMicheletti@zelle.com; malioto@tatp.com; lauren russell@tatp.com; kaylee.yang@bakerbotts.com; reilly.stoler@bakerbotts.com; yan.zhang@bakerbotts.com; David Hwu
Subject: RE: Irico 12/7/18 and 1/16/19 Production Issues
Attachments: IRI-CRT009 File Listing.xlsx

Hi Qianwei,

As discussed on our meet and confer call this afternoon, here is information on how to access the Chinese characters in the files you described below.

1. Production IRI-CRT009: as discussed, the Excel files exported from Irico's Newgrand database do not have viewable Chinese characters due to corruption in the source data. However, the Chinese characters are preserved in .csv files exported from the same source data. Please see the extracted text files for the .csv files identified in the attached table. Each .xls file has a corresponding .csv file exported from the same source data, identified by the "Group No" and "File Path" fields on the attached table.
2. Production IRI-CRT010: the three files you identified are .DBF database files. The Chinese characters can be viewed in the native files by taking the following steps:
 - Download and install a DBF viewer application (a number are publicly available for free; <http://dbfviewer.com/> is one option)
 - If the DBF viewer application does not properly display the Chinese characters after opening the native file, change the following setting on your PC: Control Panel -> Region -> Administrative -> Current language for non-Unicode programs -> change to "Chinese (Simplified, China)".
 - After restarting your PC, the DBF viewer should display the Chinese characters correctly.

Please let us know if you continue to have trouble accessing the files after trying the steps above.

Best,
Tom Carter

From: Qianwei Fu <QFu@zelle.com>
Sent: Friday, January 18, 2019 5:39 PM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>
Cc: Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; mheaphy@saveri.com; Geoff@saveri.com; Rick@saveri.com; Christopher T. Micheletti <CMicheletti@zelle.com>; malioto@tatp.com; Carter, Tom <Tom.Carter@BakerBotts.com>; lauren russell@tatp.com; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Stoler, Reilly <reilly.stoler@bakerbotts.com>; Zhang, Yan <yan.zhang@bakerbotts.com>; David Hwu <dhwu@saveri.com>
Subject: Irico 12/7/18 and 1/16/19 Production Issues

Stuart –

Some documents in Irico's 12/7/18 and 1/16/19 productions cannot be accessed properly.

(1) Production #9: your 12/7/18 Letter explains that while the Chinese characters do not display properly in Excel, the original source data can be found in the associated text file. However, about half of the text files don't contain any Chinese characters at all (e.g., IRI-CRT-00003526, 3529, 3530, 3532, 3534, 3536, 3538, 3539, 3542).

(2) Production #10: the Chinese characters in IRI-CRT-00003544, 46, and 643 do not display properly and the associated text files do not contain those characters either.

Can you please check with Irico to fix these production issues?

Thanks,
Qianwei

Qianwei Fu
Attorney at Law
qfu@zelle.com

ZELLE LLP

44 Montgomery Street, Suite 3400
San Francisco, CA 94104
D (415) 633-1906
F (415) 693-0770
[vCard](#) | [Bio](#) | [Website](#)

Boston | Dallas | London | Miami | Minneapolis
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From: stuart.plunkett@bakerbotts.com <stuart.plunkett@bakerbotts.com>
Sent: Thursday, January 17, 2019 8:52 PM
To: lauren russell@tatp.com
Cc: Qianwei Fu <qfu@zelle.com>; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; mheaphy@saveri.com; Geoff@saveri.com; Rick@saveri.com; Christopher T. Micheletti <cmicheletti@zelle.com>; malioto@tatp.com; Tom.Carter@BakerBotts.com; kaylee.yang@bakerbotts.com; reilly.stoler@bakerbotts.com; yan.zhang@bakerbotts.com
Subject: Re: Irico: 1/16/19 Letter from Capurro to Plunkett

--EXTERNAL EMAIL--

Geoff and Matt, would 1:00 Wednesday work for you?

On Jan 17, 2019, at 5:53 PM, Lauren C. Capurro <lauren russell@tatp.com> wrote:

We are available next Wednesday afternoon.

On Thu, 17 Jan 2019 18:36:08 +0000
<stuart.plunkett@bakerbotts.com> wrote:
> Are plaintiffs available for a meet and confer call on
> Wednesday, anytime after 12:30 PT?
>

> Stuart C. Plunkett
> Partner, San Francisco Office
> stuart.plunkett@bakerbotts.com<<mailto:stuart.plunkett@bakerbotts.com>>
> T +1.415.291.6203
> C +1.415.608.8165
>
>From: Qianwei Fu <QFu@zelle.com>
> Sent: Wednesday, January 16, 2019 9:39 AM
> To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>
> Cc: Taladay, John <john.taladay@bakerbotts.com>; Koons,
> Erik <erik.koons@bakerbotts.com>; LaurenRussell@TATP.com;
> mheaphy@saveri.com; Geoff@saveri.com; Rick@saveri.com;
> Christopher T. Micheletti <CMicheletti@zelle.com>;
> malioto@tatp.com; Carter, Tom
> <Tom.Carter@BakerBotts.com>; Yang, Kaylee
> <kaylee.yang@bakerbotts.com>; Stoler, Reilly
> <reilly.stoler@bakerbotts.com>
> Subject: Irico: 1/16/19 Letter from Capurro to Plunkett
>
> Stuart –
>
> Please see attached.
>
> Thanks,
> Qianwei
>
>
> Qianwei Fu
> Attorney at Law
> qfu@zelle.com<<mailto:qfu@zelle.com>>
>
> ZELLE LLP
> 44 Montgomery Street, Suite 3400
> San Francisco, CA 94104
> D (415) 633-1906
> F (415) 693-0770
> vCard<<http://www.zelle.com/vcard-32.vcf>> |
> Bio<<http://www.zelle.com/attorneys-32.html>> |
> Website<<http://www.zelle.com/>>
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>From:
> stuart.plunkett@bakerbotts.com<<mailto:stuart.plunkett@bakerbotts.com>>
> <stuart.plunkett@bakerbotts.com<<mailto:stuart.plunkett@bakerbotts.com>>>
> Sent: Tuesday, January 15, 2019 12:37 PM
> To:
> LaurenRussell@TATP.com<<mailto:LaurenRussell@TATP.com>>;
> Geoff@saveri.com<<mailto:Geoff@saveri.com>>
> Cc:
> john.taladay@bakerbotts.com<<mailto:john.taladay@bakerbotts.com>>;
> erik.koons@bakerbotts.com<<mailto:erik.koons@bakerbotts.com>>;

>mheaphy@saveri.com<mailto:mheaphy@saveri.com>;
>Rick@saveri.com<mailto:Rick@saveri.com>; Christopher T.
>Micheletti
><cmicheletti@zelle.com<mailto:cmicheletti@zelle.com>>;
>Qianwei Fu <qfu@zelle.com<mailto:qfu@zelle.com>>;
>malioto@tatp.com<mailto:malioto@tatp.com>
> Subject: RE: CRT discovery and briefing schedule
>
> --EXTERNAL EMAIL--
>
> All: we will be providing an update on outstanding
>discovery items, and responding to your proposed
>schedule. Stuart
>
> Stuart C. Plunkett
> Partner, San Francisco Office
> stuart.plunkett@bakerbotts.com<mailto:stuart.plunkett@bakerbotts.com>
> T +1.415.291.6203
> C +1.415.608.8165
>
>From: Lauren Capurro (Russell)
><LaurenRussell@TATP.com<mailto:LaurenRussell@TATP.com>>
> Sent: Tuesday, January 15, 2019 12:28 PM
> To: 'Geoff Rushing'
><Geoff@saveri.com<mailto:Geoff@saveri.com>>; Plunkett,
>Stuart
><stuart.plunkett@bakerbotts.com<mailto:stuart.plunkett@bakerbotts.com>>
> Cc: Taladay, John
><john.taladay@bakerbotts.com<mailto:john.taladay@bakerbotts.com>>;
>Koons, Erik
><erik.koons@bakerbotts.com<mailto:erik.koons@bakerbotts.com>>;
>'Matthew Heaphy'
><mheaphy@saveri.com<mailto:mheaphy@saveri.com>>; 'Rick
>Saveri' <Rick@saveri.com<mailto:Rick@saveri.com>>;
>CMicheletti@zelle.com<mailto:CMicheletti@zelle.com>;
>QFu@zelle.com<mailto:QFu@zelle.com>;
>malioto@tatp.com<mailto:malioto@tatp.com>
> Subject: RE: CRT discovery and briefing schedule
>
> Stuart:
>
> IPPs second the DPP request for an update regarding
>Irico's production of documents, which you previously
>said would be completed by "early January." See Dec. 3,
>2018 letter (attached). IPPs are also anxious to receive
>the CRT models nos. and the list of TV brands that
>sourced CRTs from Irico, which you promised to provide
>"fairly soon" on our November 28, 2018 call. See id.
>Please let us know when we can expect to receive this
>information.
>
> We will shortly be sending a list of other outstanding
>items, all of which were also detailed in our Dec. 3,
>2018 letter.
>
> Thank you for your attention to these matters.
>
> Best,
>
> Lauren
>

> Lauren C. Capurro (Russell)
> Attorney at Law
> Trump, Alioto, Trump & Prescott, LLP
> 2280 Union Street
> San Francisco, CA 94123
> Tel: (415) 563-7200
> Direct line: (415) 447-1496
> Cell: (415) 860-5051
> Fax: (415) 346-0679
> E-mail:
> lauren russell@tatp.com <<mailto:lauren russell@tatp.com>>

>
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>
> From: Geoff Rushing [<mailto:Geoff@saveri.com>]
> Sent: Friday, January 11, 2019 4:16 PM
> To:
> stuart.plunkett@bakerbotts.com <<mailto:stuart.plunkett@bakerbotts.com>>
> Cc:
> john.taladay@bakerbotts.com <<mailto:john.taladay@bakerbotts.com>>;
> erik.koons@bakerbotts.com <<mailto:erik.koons@bakerbotts.com>>;
> Lauren Capurro (Russell); Matthew Heaphy; Rick Saveri;
> CMicheletti@zelle.com <<mailto:CMicheletti@zelle.com>>;
> QFu@zelle.com <<mailto:QFu@zelle.com>>
> Subject: CRT discovery and briefing schedule

>
> Stuart:
>
> Here is a stipulation for discovery and briefing based
> on depositions going forward the week of March 4, as we
> have agreed. Please forward proposed revisions,
> comments, etc. at your earliest convenience.

>
> Can you please also provide an update on your clients'
> plans to produce additional documents?

>
> Happy new year and have a nice weekend.

>
> Geoff

>
>
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Group No	Filename	Prod Begin Bates	File Path
1	01 彩虹集团公司 1999 商品销售收入.csv	IRI-CRT-00003527	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 1999 商品销售收入.csv
1	01 彩虹集团公司 1999 商品销售收入.xls	IRI-CRT-00003526	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 1999 商品销售收入.xls
2	01 彩虹集团公司 2000 商品销售收入.csv	IRI-CRT-00003528	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2000 商品销售收入.csv
2	01 彩虹集团公司 2000 商品销售收入.xls	IRI-CRT-00003529	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2000 商品销售收入.xls
3	01 彩虹集团公司 2001 商品销售收入.csv	IRI-CRT-00003531	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2001 商品销售收入.csv
3	01 彩虹集团公司 2001 商品销售收入.xls	IRI-CRT-00003530	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2001 商品销售收入.xls
4	01 彩虹集团公司 2002 商品销售收入.csv	IRI-CRT-00003533	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2002 商品销售收入.csv
4	01 彩虹集团公司 2002 商品销售收入.xls	IRI-CRT-00003532	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2002 商品销售收入.xls
5	01 彩虹集团公司 2003 商品销售收入.csv	IRI-CRT-00003535	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2003 商品销售收入.csv
5	01 彩虹集团公司 2003 商品销售收入.xls	IRI-CRT-00003534	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2003 商品销售收入.xls
6	01 彩虹集团公司 2005 商品销售收入.csv	IRI-CRT-00003537	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2005 商品销售收入.csv
6	01 彩虹集团公司 2005 商品销售收入.xls	IRI-CRT-00003536	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\01 彩虹集团公司\01 彩虹集团公司 2005 商品销售收入.xls
7	04 彩虹集团公司 2005 主营业务收入.csv	IRI-CRT-00003541	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2005 主营业务收入.csv
7	04 彩虹集团公司 2005 主营业务收入.xls	IRI-CRT-00003538	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2005 主营业务收入.xls
8	04 彩虹集团公司 2006 主营业务收入.csv	IRI-CRT-00003540	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2006 主营业务收入.csv
8	04 彩虹集团公司 2006 主营业务收入.xls	IRI-CRT-00003539	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2006 主营业务收入.xls
9	04 彩虹集团公司 2007 主营业务收入.csv	IRI-CRT-00003543	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2007 主营业务收入.csv
9	04 彩虹集团公司 2007 主营业务收入.xls	IRI-CRT-00003542	\0002HD0020002HD002\Project KONA (H36846) - 005.adf\04 彩虹集团公司\04 彩虹集团公司 2007 主营业务收入.xls

EXHIBIT 3

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ABOUT GPX

GPX, Inc., formerly Dick Proctor Imports, was founded in 1971 in St. Louis, Missouri. It began operations as an importer of factory brand consumer electronics from the Orient. With the inception of the Gran Prix Electronics division in 1973, the Company began designing and contracting for the manufacture of products under its own brand name, "Gran Prix". This evolution continued until the line was entirely composed of items exclusively designed and manufactured for Gran Prix Electronics. In 1985, Dick Proctor Imports, Inc. was formally changed to GPX, Inc. Subsequently, the product brand was changed from "Gran Prix" to "GPX". In 1986, the Dutch company Hagemeyer, N.V. acquired a majority interest in GPX. Over the ensuing 8 years, GPX continued to grow by adding new categories and continuing to build its relationships with retailers. GPX was acquired in April 2004 by Synergy Enterprises, LLC, a New Jersey-based private investment firm that specializes in the acquisition of platform companies with significant growth potential.

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